

Exhibit I

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ACQIS LLC, a Texas limited)
liability company,)
Plaintiff,)
vs.) Civil Action No.
SAMSUNG ELECTRONICS CO.,)
LTD., a Korean business)
entity, and SAMSUNG)
ELECTRONICS AMERICA, INC., a)
New York corporation,)
Defendants.)

REMOTE VIDEO-RECORDED DEPOSITION OF

MARC E. LEVITT, PH.D.

June 23, 2021

9:10 a.m. - 1:57 p.m.

Reported by: Carrie LaMontagne, CSR No. 13393

1 data/information. And that is construed as
2 information described in the USB specification, if
3 I'm reading that correctly?

4 A. Yeah, I have it as USB protocol
5 information. So I'm not sure if it's slash data, I
6 think is what you said.

7 Q. Yeah, you're right, it should just be USB
8 protocol information?

9 A. Yes.

10 Q. So what is data payload?

11 A. So as described within my declaration, the
12 payload is -- the data payload is the field within
13 the data packet that holds data. And data for
14 within USB is just a collection of bytes that
15 specifically has no real format or -- or exact
16 meaning within there, as -- as I talk about within
17 my declaration that USB does not impose really any
18 specific meaning to the data payload or the data
19 fields.

20 Q. So you said USB doesn't.

21 But does the asserted patents describe what USB
22 data payload is?

23 A. Please give me a second.

24 Q. Yeah, please, take your time.

25 A. From my review right now of the patent, I

1 do not see any specific exact mention of that --
2 that term within the specification. But it does
3 refer to USB and various versions thereof within the
4 specification.

5 Q. Okay. So -- so that second construction
6 we talked about, USB universal serial bus, paren,
7 USB protocol information --

8 A. Yes.

9 Q. -- that is construed as information
10 described in USB specification, what USB
11 specification do you think that applies to?

12 A. Well, within the -- within the patents and
13 what is mentioned in the time frame, it is -- it
14 would be the appropriate parts of USB 2.0 or
15 potentially earlier versions, which would be 1.1.

16 Q. Did you say 1.1?

17 A. Yeah, or 1.1, yes. 2.0 and earlier. USB
18 1.0 never really made it out the door.

19 Q. Okay. Thank you for that. And, sorry, I
20 sort of cut you off again.

21 And I believe, at least in the '768 Patent,
22 they -- they mention USB 2.0.

23 Is that your recollection?

24 A. That is my recollection and correct.

25 Q. And you -- in your answer before, you